

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ROBERT CALDWELL,

Defendant.

CRIMINAL NO. JKB 23cr222

(False Statements in Connection with
Acquisition of a Firearm, 18 U.S.C. §
922(a)(6); Engaging in the Business of
Dealing in Firearms Without a
License, 18 U.S.C. §§ 922(a)(1)(A),
923(a); Forfeiture, 18 U.S.C. § 924(d),
28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(False Statements in Connection with Acquisition of a Firearm)

The Grand Jury for the District of Maryland charges that:

On or about November 18, 2022, in the District of Maryland, the defendant,

ROBERT CALDWELL,

in connection with the acquisition of a firearm, to wit, one Glock model 19X 9mm pistol, bearing serial number BKHK071, one Glock model 23 .40 caliber pistol, bearing serial number ZBG649, and one Hanover Armory model HA-15 5.56 caliber rifle, bearing serial number 200866, from Pasadena Pawn and Gun, LLC, a federal firearms licensed dealer, knowingly made a false and fictitious written statement to Pasadena Pawn and Gun, LLC, which statement was intended to and likely to deceive Pasadena Pawn and Gun, LLC, as to a fact material to the lawfulness of such acquisition of the said firearm under chapter 44 of Title 18, United States Code, in that he made the statement representing that he was the actual buyer/transferee of the firearm and was not acquiring the firearm on behalf of another person, when in fact, as he then knew, he was not the actual buyer/transferee of the firearm and was acquiring the firearm on behalf of another person.

18 U.S.C. § 922(a)(6)

COUNT TWO
(Engaging in the Business of Dealing in Firearms Without a License)

The Grand Jury for the District of Maryland charges that:

On or about June 28, 2022, in the District of Maryland, the defendant,

ROBERT CALDWELL,

not being a licensed dealer, importer, or manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 923(a), and in the course of such business transported a firearm, to wit, one Glock model 23 .40 caliber pistol, bearing serial number AGVH638, in interstate commerce.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 923(a)

COUNT THREE
(Engaging in the Business of Dealing in Firearms Without a License)

The Grand Jury for the District of Maryland charges that:

On or about February 18, 2023, in the District of Maryland, the defendant,

ROBERT CALDWELL,

not being a licensed dealer, importer, or manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 923(a), and in the course of such business transported a firearm, to wit, one Glock model 32GEN4 .357 SIG pistol, bearing serial number BXDR267, in interstate commerce.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 923(a)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the Defendant's convictions under Counts One, Two, or Three.

Firearm and Ammunition Forfeiture

3. Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of an offense alleged in Counts One, Two, or Three, the Defendant shall forfeit to the United States any firearms involved in such offense(s).

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:
- a. one Glock model 23 .40 caliber pistol, bearing serial number AGVH638; and
 - b. one Glock model 32GEN4 .357 SIG pistol, bearing serial number BXDR267.

Substitute Assets

5. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been comingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the property charged with forfeiture in the paragraphs above.

18 U.S.C. § 924(d)
21 U.S.C. § 853
28 U.S.C. § 2461(c)

Erek L. Barron / JST
Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

6/28/2023
Date